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Attorneys for Creditor
TRINITY FINANCIAL SERVICES, LLC

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
LOS ANGELES DIVISION

In re	Case No. 2:17-bk-21970-VZ
CARLOS GALVAN MARTINEZ,	Chapter 13
Debtor,	Adversary No. 2:18-ap-01009-VZ
CARLOS GALVAN MARTINEZ,	STIPULATION TO USE OF THIRD-
Plaintiff,	PARTY APPRAISER MICHAEL D.
v.	TURNER AND TO EXTEND DISCOVERY
TRINITY FINANCIAL SERVICES, LLC,	DEADLINE, WRITTEN EXPERT
Defendant.	REPORTS DEADLINE, AND
	SUPPORTING DECLARATIONS
	DEADLINE FROM OCTOBER 1, 2018 TO
	OCTOBER 31, 2018
	[PRE-TRIAL CONFERENCE]
	DATE: 1/24/19
	TIME: 11:00 A.M.
	CTRM: 1368

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Debtor /Plaintiff, Carlos Galvan Martinez (the “Debtor”), on the one hand, and Creditor Trinity Financial Services, LLC (“Trinity,” and collectively with the Debtor, the “Parties”), on the other hand, by and through counsel, request that the Court approve the following stipulation of the Parties.

STIPULATION

The Parties have agreed to employ third-party appraiser Michael D. Turner (the “Appraiser”) in an attempt to resolve the Debtor’s *Complaint to Avoid Junior Lien on Principal Residence* [Adversary Docket No. 1]. The Appraiser will file a forthcoming independent appraisal report (the “Turner Report”) determining the value of the Debtor’s primary residence—4628 46287 ½ St. Elmo Dr., Los Angeles, CA 90019 (the “Property”).

The Parties agreed to employ the Appraiser only on September 28, 2018. Thus, the Parties have agreed that the Discovery Deadline, Written Expert Reports Deadline, and Supporting Declarations Deadline shall be continued from **October 1, 2018** to **October 31, 2018**.

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3 **WHEREFORE, THE PARTIES STIPULATE AS FOLLOWS:**

4 The Parties have agreed that the forthcoming Turner Report will assist in determining the
5 value of the Property. Additionally, the Discovery Deadline, Written Expert Reports Deadline,
6 and Supporting Declarations Deadline will be continued from **October 1, 2018 to October 31,**
7 **2018.**

8 Dated: 10/1/18 September __, 2018

Respectfully submitted,

9 LAW OFFICES OF RAYMOND PEREZ

10
11 By: 

12 Raymond Perez
13 Attorneys for Debtor
14 CARLOS GALVAN MARTINEZ

15 Dated: October 1, 2018

BURKE, WILLIAMS & SORENSEN, LLP

16
17
18 By: _____

19 Rafael R. Garcia-Salgado
20 Richard J. Reynolds
21 ~~Rafael R. Garcia-Salgado~~
22 Attorneys for Creditor
23 TRINITY FINANCIAL SERVICES, LLC
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WHEREFORE, THE PARTIES STIPULATE AS FOLLOWS:

The Parties have agreed that the forthcoming Turner Report will assist in determining the value of the Property. Additionally, the Discovery Deadline, Written Expert Reports Deadline, and Supporting Declarations Deadline will be continued from **October 1, 2018** to **October 31, 2018**.

Dated: September __, 2018

Respectfully submitted,

LAW OFFICES OF RAYMOND PEREZ

By: _____

Raymond Perez
Attorneys for Debtor
CARLOS GALVAN MARTINEZ

Dated: October 1, 2018

BURKE, WILLIAMS & SORENSEN, LLP

By: _____


Rafael R. Garcia-Salgado
Richard J. Reynolds
Rafael R. Garcia-Salgado
Attorneys for Creditor
TRINITY FINANCIAL SERVICES, LLC

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: **1851 East First Street, Suite 1550, Santa Ana, California 92705-4067**

A true and correct copy of the foregoing document entitled (*specify*): **STIPULATION TO VALUE LISTED IN APPRAISAL OF APPRAISER MICHAEL TURNER AND TO EXTEND DISCOVERY DEADLINE, WRITTEN EXPERT REPORTS DEADLINE, AND SUPPORTING DECLARATIONS DEADLINE FROM OCTOBER 1, 2018 TO OCTOBER 31, 2018**

will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):

Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) **10/1/18**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- Nancy K Curry (TR) TrusteeECFMail@gmail.com
- Rafael R Garcia-Salgado rgarcia@bwsllaw.com, bantle@bwsllaw.com, rjr-nef@bwsllaw.com, jgomez@bwsllaw.com
- Raymond Perez rperezlaw.ela@gmail.com
- United States Trustee (LA) ustpregion16.la.ecf@usdoj.gov

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (*date*) **10/1/18**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Debtor:

Carlos Galvan Martinez
4628 1/2 St. Elmo Dr
Los Angeles, CA 90019

Judge:

Honorable Vincent P. Zurzolo
United States Bankruptcy Court
Central District of California
Edward R. Roybal Federal Building and
Courthouse
255 E. Temple Street, Suite 1360
Los Angeles, CA 90012

☐ Service information continued on attached page

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**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE
TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to

F.R.Civ.P. 5 and/or controlling LBR, on (date) _____, I served the following persons and/or
entities by personal delivery, overnight mail service, or (for those who consented in writing to
such service method), by facsimile transmission and/or email as follows. Listing the judge here
constitutes a declaration that personal delivery on, or overnight mail to, the judge will be
completed no later than 24 hours after the document is filed.

☐ Service information continued
on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true
and correct.

October 1, 2018 Bernadette C. Antle
Date *Printed Name*


Signature